

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

WILLIAM VORGAS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CAUSE NO. 1:22-cv-835
	)	
CATALENT INDIANA LLC,	)	
	)	
	)	
Defendant.	)	

**COMPLAINT AND DEMAND FOR JURY TRIAL**

The Plaintiff, William Vorgias (“Vorgias”), by counsel, hereby brings this action against the Defendant, Catalent Indiana LLC (“Defendant”), alleging that Defendant has violated his rights as protected by Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.* (“Title VII”).

**I. PARTIES, JURISDICTION, AND VENUE**

1. At all relevant times, Vorgias has resided within the Southern District of Indiana, Indianapolis Division.

2. Defendant is a corporation that is located and operates and conducts business within the Southern District of Indiana, Indianapolis Division.

3. Jurisdiction is conferred on this Court by 28 U.S.C. § 1331, 28 U.S.C. § 1343, 42 U.S.C. § 1988 and 42 U.S.C. § 2000e-5(f)(3).

4. At all relevant times, Plaintiff was an “employee” of Defendant within the meaning of that term under Title VII, 42 U.S.C. § 2000e(f).

5. At all relevant times, Defendant was Plaintiff's "employer" within the meaning of that term under Title VII, 42 U.S.C. § 2000e(b).

6. Plaintiff has satisfied his obligation to exhaust his administrative remedies, having timely filed a Charge of Discrimination ("Charge") with the U.S. Equal Employment Opportunity Commission ("EEOC"). Plaintiff received his "Dismissal and Notice of Rights" ("Notice") from the EEOC regarding his Charge, evidencing his right to sue in federal court, and now timely files this lawsuit within ninety (90) days after receipt of said Notice.

7. All of the events, transactions and occurrences giving rise to this lawsuit occurred within the geographical environs of the Southern District of Indiana, Indianapolis Division, and all parties are located therein. All of the claims asserted in this Complaint arose out of the conduct, transactions and occurrences set out in or attempted to be set out in Plaintiff's original pleading.

8. Venue is proper in this Court pursuant to 28 U.S.C. § 1391.

## **II. FACTUAL ALLEGATIONS**

9. Vorgias was hired by Defendant on October 19, 2020 as a Manufacturing Operator.

10. Throughout his employment, Vorgias met or exceeded Defendant's legitimate employment expectations, with his only performance review stating unambiguously that his "[p]erformance and behavior fully and consistently met expectations."

11. Vorgias identifies as a member of the LGBTQ+ community, placing him in a protected class under Title VII.

12. Specifically, Vorgias is a gay man, and upon information and belief, all of his coworkers knew that he was gay.

13. On July 13, 2021, and July 22, 2021, Vorgias complained to Joseph Toole ("Toole"), his supervisor, that employee Kevin Grange ("Grange") was making derogatory comments about Vorgias, his sexual orientation, and/or the LGBTQ+ community in general.

14. Grange was a longtime employee of Defendant and as a Senior Manufacturing Associate, provided feedback regarding Vorgias's performance for his reviews.

15. On August 13, 2021, Vorgias made a formal complaint to Toole regarding and opposing the ongoing harassing behavior of Grange. This formal complaint constitutes statutorily protected behavior.

16. Following an informal investigation that did not involve Defendant's HR Department, no action was taken to cure or correct Grange's behavior.

17. On September 20, 2021, Vorgias e-mailed a letter to Brad Jones ("Jones"), a human resources representative of Defendant, expressing disappointment with Defendant's investigation of Grange and requesting a formal and more thorough investigation, as well as a transfer to another department and reimbursement of PTO days. Vorgias indicated that he was considering filing a Charge of Discrimination with the EEOC. This letter constitutes statutorily protected conduct.

18. On September 27, 2021, Defendant informed Vorgias that it was now investigating him for sexual harassment and Jones stated “you asked for this” to Vorgias.

19. On October 13, 2021, Defendant terminated Vorgias.

### **III. LEGAL ALLEGATIONS**

#### **COUNT I RETALIATION – TITLE VII**

20. Vorgias hereby incorporates paragraphs one (1) through nineteen (19) above as if the same were set forth at length herein.

21. Defendant took adverse employment action against Vorgias based on his statutorily-protected activity in violation of Title VII when it terminated his employment.

22. Defendant’s actions, as alleged above, deprived Vorgias of equal employment opportunities and otherwise adversely affected the terms and conditions of his employment.

23. Defendant’s unlawful actions were intentional, willful, and done in reckless disregard of Vorgias’s rights under Title VII.

#### **REQUESTED RELIEF**

WHEREFORE, the Plaintiff, William Vorgias, by counsel, respectfully requests that the Court find for him and order that:

1. Defendant reinstate Plaintiff to his same position, salary and seniority as prior to his termination or pay front pay and benefits to him in lieu thereof;

2. Defendant pay lost wages and benefits to Plaintiff;

3. Defendant pay compensatory to Plaintiff;
4. Defendant pay punitive damages to Plaintiff;
5. Defendant pay pre- and post-judgment interest to Plaintiff on all recoverable sums;
6. Defendant pay Plaintiff's reasonable attorneys' fees and costs incurred in litigating this action; and
7. Defendant pay to Plaintiff any and all other legal and/or equitable damages this Court deems just and proper to grant.

Respectfully submitted,

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Counsel for Plaintiff, William Vorgias

**DEMAND FOR JURY TRIAL**

The Plaintiff, William Vorgias, by counsel, respectfully requests a jury trial as to all issues deemed so triable.

Respectfully submitted,

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